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Victims of Purdue Pharma L.P., et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: :
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649-RDD
: (Jointly Administered)
Debtors.¹ :
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¹ The debtors in these cases (the “Debtors”), along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

**SECOND AMENDED VERIFIED STATEMENT OF THE AD HOC GROUP
OF INDIVIDUAL VICTIMS OF PURDUE PHARMA L.P., *ET AL.*,
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Ad Hoc Group of Individual Victims (the “Ad Hoc Group”) of Purdue Pharma L.P., *et al.*, hereby submits this second amended verified statement (the “Statement”) and states as follows:

1. The Ad Hoc Group is comprised of 60,761 personal injury claimants, each of which is a member of the Ad Hoc Group (collectively, the “Ad Hoc Group Members”).² The Ad Hoc Group Members are, individually, clients of ASK LLP (“ASK”) and Andrews & Thornton (“A&T”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”).³ ASK and A&T retained White & Case LLP (“W&C”) to serve as co-counsel (alongside ASK) to the Ad Hoc Group in March 2020. Each of the Ad Hoc Group Members holds one or more unsecured, unliquidated, opioid-related personal injury claims against one or more of the Debtors.

2. The names and addresses of the Ad Hoc Group Members constitute “Personally Identifying Information” as that term is defined in the *Third Amended Protective Order* [ECF No. 1935] (the “Protective Order”). Protective Order ¶ 26. Pursuant to the Protective Order, “Personally Identifying Information” shall be treated as confidential information and protected from disclosure. *Id.* ¶ 8. As such, the names and addresses of the individual Ad Hoc Group Members are not listed in this Statement.

3. The undersigned verifies that the foregoing is true and correct to the best of his knowledge.

4. The Ad Hoc Group Members make no representation with respect to the amount,

² The Ad Hoc Group Members include the individuals that were listed as members in the *Amended Verified Statement of the Ad Hoc Group of Individual Victims of Purdue Pharma L.P., et al., Pursuant to Bankruptcy Rule 2019* [ECF No. 1480], with the exception of Garrett Hade, who subsequently resigned from the Ad Hoc Group.

³ Certain Ad Hoc Group Members are, individually, represented jointly by ASK and/or A&T and another law firm in respect of their personal injury claims against one or more of the Debtors. For the avoidance of doubt, W&C does not represent any Ad Hoc Group Member individually, but rather, represents only the Ad Hoc Group.

allowance, validity, or priority of their claims and reserve all rights with respect thereto. Nothing contained herein should be construed as a limitation upon, or waiver of, any Ad Hoc Group Member's right to assert, file, and/or amend its claim(s) in accordance with applicable law and any orders entered in these Chapter 11 Cases establishing procedures for filing proofs of claim.

5. The Ad Hoc Group reserves the right to amend and/or supplement this Statement in accordance with Bankruptcy Rule 2019.

Dated: October 13, 2021
New York, New York

ASK LLP

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